

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Cr. No. 21-173 (PJS/DTS)

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	DEFENDANT’S MOTION FOR EXTENSION OF TIME TO FILE PRETRIAL MOTIONS
)	
v.)	
)	
ANTON JOSEPH LAZZARO (1),)	
)	
Defendant.)	

Defendant Anton Lazzaro respectfully requests that the Court extend the date for filing of pre-trial motions through January 14, 2022. The current deadline for these filings is January 10, 2022. Mr. Lazzaro is seeking this limited four-day extension of time to ensure the adequate preparation of his defense as well as to maximize his participation in strategic decision making with his counsel of choice. No further extensions will be sought.

Mr. Lazzaro was indicted in August 2021. Mr. Lazzaro was arrested in August 2021 and has remained in custody at the Sherburne County Jail since that time. Mr. Lazzaro is simultaneously filing a motion for exclusion of this four-day period (January 10th through 14th) from the Speedy Trial Act calculation.

Undersigned counsel attempted to schedule a weekend conference with Mr. Lazzaro through the Sherburne County Jail to review in detail the proposed pre-trial filings at length. Unfortunately, Sherburne County Jail was unable to accommodate the request of counsel to allow for a video visitation with Mr. Lazzaro over the weekend.

Due to COVID-19 visitation restrictions, Mr. Lazzaro could not meet with his counsel in person to discuss the proposed filings during this time either. The requested extension of time is vital to ensuring that Mr. Lazzaro can adequately participate in the preparation of his defense.

Mr. Lazzaro asks that the Court grant a corresponding 4-day extension of time of all response and reply deadlines in order to allow for orderly briefing.

Defense counsel has conferred with Assistant United States Attorney Laura Provinzino who has been made aware of the circumstances for the requested extension. Ms. Provinzino advised that the Government is opposed to this requested four-day extension of time.

Respectfully submitted,

/s/ Zachary Newland
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Counsel for Anton Lazzaro

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was duly filed and served upon counsel of record, via the Court's CM/ECF system, this 10th day of January 2022.

/s/ Zachary L. Newland
Zachary L. Newland